

SILLS CUMMIS & GROSS P.C.

Jeffrey J. Greenbaum

Katherine M. Lieb

One Riverfront Plaza

Newark, New Jersey 07102

(973) 643-7000

PATTERSON BELKNAP WEBB & TYLER LLP

Adeel A. Mangi

Harry Sandick (admitted *pro hac vice*)

George LoBiondo

1133 Avenue of the Americas

New York, New York 10036

(212) 336-2000

Attorneys for Plaintiff

Johnson & Johnson Health Care Systems Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JOHNSON & JOHNSON

HEALTH CARE SYSTEMS INC.,

Plaintiff,

vs.

SAVE ON SP, LLC,

Defendant.

:

Civil Action No. 22-2632 (JKS)(CLW)

:

Hon. Jamel K. Semper, U.S.D.J.

:

Hon. Cathy L. Waldor, U.S.M.J.

Hon. Freda L. Wolfson, Special Master

:

NOTICE OF MOTION TO SEAL

:

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COUNSEL:

PLEASE TAKE NOTICE that on July 15, 2024 at 9:00 A.M. in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff Johnson & Johnson Health Care Systems, Inc. (“JJHCS”) and

Defendant Save On SP, LLC (“SaveOnSP”) shall jointly apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order, to (a) permanently maintain under seal the letters and supporting exhibits filed by counsel for the parties regarding (i) SaveOnSP’s Motion to Designate Additional Custodians, dated December 28, 2023, with related briefing on January 4 & 8, 2024 (ECF No. 271); (ii) SaveOnSP’s Motion to Compel regarding the Scope of CAP custodians, dated January 16, 2024, with related briefing on January 22 & 23, 2024 (ECF No. 274); (iii) SaveOnSP’s Motion to Compel regarding CAP Search Terms, dated February 7, 2024, with related briefing on February 14 & 16, 2024 (ECF No. 276); (iv) SaveOnSP’s Motion for Clarification and Reconsideration of the Court’s February 6, 2024 Order, dated February 20, 2024, with related briefing on March 1, 11, 21 & 25, 2024 (ECF No. 280) (collectively, the “Subject Motions”), and (b) permit JJHCS to file the proposed public versions the Subject Motions, attached as Exhibits A to D to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and indices in support of Motion to Seal. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to Local Civil Rule 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

SILLS CUMMIS & GROSS P.C.
One Riverfront Plaza
Newark, New Jersey 07102
(973) 643-7000

By: s/ Jeffrey J. Greenbaum
JEFFREY J. GREENBAUM
KATHERINE M. LIEB

PATTERSON BELKNAP
WEBB & TYLER LLP
Adeel A. Mangi
Harry Sandick (admitted *pro hac vice*)
George LoBiondo
1133 Avenue of the Americas
New York, New York 10036
(212) 336-2000

*Attorneys for Plaintiff Johnson & Johnson
Health Care Systems, Inc.*

By: s/ E. Evans Wohlforth, Jr.
E. EVANS WOHLFORTH, JR.
ROBINSON & COLE LLP
666 Third Avenue, 20th Floor
New York, NY 10017-4132
Main (212) 451-2900
Fax (212) 451-2999
ewohlforth@rc.com

Philippe Z. Selendy (admitted *pro hac vice*)
Andrew R. Dunlap (admitted *pro hac vice*)
Meredith Nelson (admitted *pro hac vice*)
Elizabeth H. Snow (admitted *pro hac vice*)
SELENDY GAY PLLC
1290 Avenue of the Americas
New York, NY 10104
(212) 390-9000
pselendy@selendygay.com
adunlap@selendygay.com
mnelson@selendygay.com
esnow@selendygay.com

Attorneys for Defendant Save On SP, LLC

Dated: June 18, 2024